

EXHIBIT 4

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

DENNIS HANSCOM, on behalf of himself and
all others similarly situated,

Plaintiff,

vs.

NORDSEC LTD., NORDSEC B.V., NORDVPN
S.A., NORD SECURITY INC., and TEFINCOM
S.A. d/b/a NORDVPN,

Defendants.

CASE NO. 3:24-CV-00277-KDB-DCK

**DECLARATION OF ALINA GATSANIUK IN SUPPORT OF DEFENDANT
TEFINCOM S.A.'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

Alina Gatsaniuk declares as follows:

1. I am a director at Tefincom S.A. I am competent to testify and make this declaration based on my personal knowledge.
2. I understand that this litigation involves claims that Nordvpn S.A. charged a customer in North Carolina for a recurring subscription to retail consumer VPN and related services, allegedly without the customer's consent. I further understand that the customer first subscribed to NordVPN and related services in August 2023.
3. Tefincom S.A. is incorporated under the laws of the Republic of Panama, and its principal place of business is Panama City, Panama. Tefincom S.A. was the contracting entity for retail consumer VPN services purchased on or before November 15, 2020, only. Tefincom S.A. might still be the contracting entity for contracts entered into on or before that date, but it did not offer new contracts or consumer VPN services after November 15, 2020, including in 2023. Tefincom S.A. did not contract with the North Carolina customer for any such services, and it did not charge him for or provide any such services.

4. Tefincom S.A. maintains its own funds in an independent account sufficient to operate its business.

5. Tefincom S.A. is organized and governed by its own deed of incorporation and other corporate statutory documents, as a stand-alone entity.

6. Tefincom S.A. is managed by its own board and holds its own shareholder meetings, as required.

7. Tefincom S.A. accurately maintains its own business records, including financial records, minutes from shareholder meetings, corporate tax filings, and other corporate documents, such as the deed of incorporation and corporate resolutions.

8. Tefincom S.A. shares one director with Nordvpn S.A. Tefincom S.A. does not otherwise share officers or directors with the other Defendants, and the other Defendants do not control Tefincom S.A.

9. Tefincom S.A. does not have offices, employees, or contractors in North Carolina.

10. Tefincom S.A. has never purchased or used advertising space or held an event of any kind in North Carolina for retail consumer VPN or related services.

11. Tefincom S.A. does not ship products into North Carolina.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 1st day of July, 2024.



Director

Alina Gatsaniuk